

**FILED**

April 05, 2023

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

BY: \_\_\_\_\_ SO \_\_\_\_\_  
DEPUTY

**UNITED STATES OF AMERICA  
Plaintiff**

**v**

**GENOTOX LABORATORIES LTD.  
Defendant**

**1:23-CR-062-RP**

**INFORMATION**

**[Ct. 1: 42 U.S.C. § 1320a-7(b) – Anti-Kickback Statute]**

**THE UNITED STATES ATTORNEY CHARGES:**

**COUNT ONE  
Anti-Kickback Statute  
[42 U.S.C. § 1320a-7(b)]**

From approximately 2014 to approximately 2020, in the Western District of Texas and elsewhere, Defendant,

**GENOTOX LABORATORIES LTD.**

did knowingly and willfully pay remuneration, to wit: percentage commission payments on revenue realized from toxicology testing, to one or more persons, to wit: sales and marketing representatives not in a bona fide employment relationship with Defendant, to induce such persons to arrange for and recommend the purchase and order of toxicology testing, which was a good, service, and item, for which payment was made in whole or in part under Medicare, Medicaid, and Tricare, each of which were Federal health care programs.

In violation of 42 U.S.C. § 1320a-7b(b).

JAIME ESPARZA  
UNITED STATES ATTORNEY

By: \_\_\_\_\_

  
G. KARTHIK SRINIVASAN  
ALAN BUIE  
ASSISTANT UNITED STATES ATTORNEYS